

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

W.A.O., *et al.*, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

UR M. JADDOU, *et al.*,

Defendants.

Civil Action No. 2:19-cv-11696-MCA-
MAH

**[PROPOSED] ORDER GRANTING
JOINT MOTION FOR
PRELIMINARY APPROVAL OF
STIPULATION OF SETTLEMENT
AND DISMISSAL**

The Court determines, preliminarily, that the Parties' January 4, 2022, Stipulation of Settlement and Dismissal ("Settlement Agreement") and its terms fall within the range of reasonableness and merit final approval.

The Court also determines that the Class Notice and notice procedures as described in the Settlement Agreement: (i) meet the requirements of Rule 23(c)(2)(A) and (e)(1) and due process; (ii) are the best practicable notice under the circumstances; (iii) are reasonably calculated, under the circumstances, to apprise Class Members of their right to object to the proposed Settlement; and (iv) are reasonable and constitute due, adequate, and sufficient notice to all those entitled to receive notice.

Having determined the above, the Court hereby GRANTS the Parties' Joint Motion for Preliminary Approval of the Settlement Agreement, and orders the following:

1. The proposed Notice of Proposed Settlement and notice procedure, as set forth in the Settlement Agreement, are approved;

2. There are no rights to “opt-out” of the Settlement Agreement, and the proposed agreement would bind Class Members;

3. The Parties shall cause the Class Notice to be disseminated in the manner set forth in the Settlement Agreement;

4. Any Presumed, Unidentified, or other Class Member who wishes to object to the settlement and/or be heard at the Final Approval hearing must submit a written notice of objection and/or request to be heard at the Final Approval Hearing, postmarked within 35 days after the Preliminary Notice Date (or such other deadline as the Court might order), by mailing the notice of objection and/or request to be heard to the Clerk of the Court for the District of New Jersey, or by filing the notice of objection and/or request to be heard with the Court. Each notice of objection or request to be heard must include: (1) the case name and number, (2) the Class Member’s name, (3) the Class Member’s current address and telephone number, or current address and telephone number of the Class Member’s legal representative, and (4) an explanation of why the Class Member objects to the Settlement, including the grounds therefore, any supporting documentation, and the reasons, if any, for requesting the opportunity to appear and be heard at the Final Approval hearing.

5. The Notice Date is hereby set for the ~~later of~~ February 28, 2022, ~~or five business days after the entry of this Order.~~

6. The deadline for objections to the Settlement Agreement is hereby set APRIL 4, 2022.
for ~~35 days following the date on which preliminary notice is accomplished pursuant~~
to ~~Paragraph 5 of this Order.~~

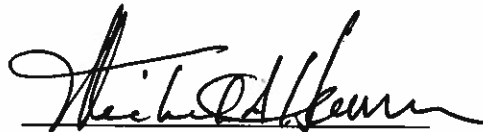
7. The Final Approval Hearing to consider the fairness, reasonableness,
and adequacy of the Settlement Agreement is hereby set for 10:00 a.m. p.m.

on APRIL 20, 2022 at The hearing will be conducted via Zoom, the link
for which is:

<https://www.zoomgov.com/j/1601556238?pwd=cKFTcVYxQWY3cEIEZmh4UkU6TmdzO>

IT IS SO ORDERED.

DATE: 2/10/2022



MICHAEL A. HAMMER

United States Magistrate Judge